



The Chemical Company

April 8, 2013

Mr. Juan Thomas  
Project Manager, RCRA Corrective Action Section  
US Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Blvd  
Chicago, IL 60604-3511

Subject:

BASF North Works CMS Work Plan  
Wyandotte, MI

Dear Mr. Thomas:

I appreciated the opportunity to talk with you on March 27, 2013, regarding the Corrective Measures Study (CMS) Work Plan for BASF's North Works Facility. During that call, you expressed some concerns regarding the scope and timing elements presented in the CMS Work Plan BASF submitted on October 31<sup>st</sup>, 2012. The CMS Work Plan was submitted for the BASF North Works facility in accordance with the 1994 Consent Order between BASF and the USEPA Region V and as requested in your letter received on May 7, 2012 (letter dated April 26<sup>th</sup>, 2012).

BASF believes the most effective approach to RCRA Corrective Action is to manage exposure and risk at the property boundary vs. focusing on individual solid waste management units (SWMUs) or areas of concern (AOCs). The Site is an active industrial facility and this approach will allow BASF the flexibility to adapt to future Site needs while continuing to address BASF's obligations under state and federal law consistent with the RCRA Corrective Action process.

BASF has proposed an integrated approach to complete Corrective Action (CA) in a streamlined fashion and is committed to gathering the remaining information needed to determine the best path for Corrective Action given the restrictions of an active and growing facility. Depending upon the results of the various field programs we are proposing, it may also be possible to integrate the North Works Corrective Action efforts with that for the offshore sediments remedy currently being developed through the USEPA's Great Lakes Legacy Act program, which you indicated during our recent telephone discussion could be a positive outcome of the CMS implementation process.



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In the CMS Work Plan, BASF committed (following USEPA concurrence) to implementing the field programs and risk evaluation update summarized below during 2013. These adaptive field programs are narrowly focused to collect specific data needed to evaluate remedial options in the CMS, including:

#### Tier II Risk Assessment Addendum

- Evaluating risk for groundwater on a Site-wide basis
- Reassessing aspects of the previously submitted Tier II Risk Evaluation based on updated MDEQ criteria, regulations, and current Site conditions
- Evaluating risk for non-aqueous phase liquid (NAPL) present in AOC-5
- Determining risk to construction and future Site workers (to be completed as part of Tier II Risk Evaluation Assessment)

#### NAPL Evaluation

- Confirm horizontal and vertical extent of DNAPL and dissolved phase constituents in AOC-5 (Well Field B)
- Determining mobility, chemical composition, and management options for DNAPL in accordance with the new Michigan DEQ NAPL guidance framework

#### Southern Property Boundary

- Delineating the presence of benzene and naphthalene identified at the southern boundary of the Site

#### Former Shipping Channel

- Confirming the horizontal and vertical extent and hydraulic properties within former shipping channels that may be acting as a preferential groundwater flow pathways

#### Geochemical Evaluation

- Collecting soil and groundwater samples from strategic locations around the site perimeter to support the proposed CM remedies

The overall CMS Work Plan objective is to efficiently define Site geochemical conditions to support selection, design, and implementation of the most feasible CM alternatives. The schedule for the completion and submission of the CMS Report (August 2014) is dependent on implementing and completing these programs in the very near future and, with USEPA concurrence, BASF is prepared to do so.



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BASF would like to meet to discuss our overall Site CA strategy and suggest that a discussion between you, BASF, and Tammy Moore to discuss the strategy and a mutually agreed path forward for completion of the CMS Report will be mutually beneficial. I will contact you within the next week to discuss and schedule a meeting at your office.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Gerdenich".

Michael Gerdenich  
Remediation Senior Specialist

Copies:

R. Conforti, MDEQ

B. Diepeveen, BASF